REMARKS

By this amendment, claims 1-3 have been amended. Thus, claims 1-3 are now active in the application. Reexamination and reconsideration of the application are respectfully requested.

The specification and abstract have been carefully reviewed and revised to correct grammatical and idiomatic errors in order to aid the Examiner in further consideration of the application. The amendments to the specification and abstract are incorporated in the attached substitute specification and abstract. No new matter has been added.

Attached hereto is a marked-up version of the changes made to the specification and Abstract by the current amendment. The attachment is captioned "**Version with markings to show changes made**."

In item 1 on page 2 of the Office Action, claims 1-3 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for use of the phrases "its vertical side", "a fallen L-shaped module base" and "the horizontal leg" in the claims. Accordingly, in order to obviate this rejection, the claim language has been reviewed and revised to address each of the concerns raised by the Examiner and to otherwise place the claims in improved U.S. form.

Next, in items 2-4 on pages 2 and 3 of the Office Action, claims 1 and 2 were rejected under 35 U.S.C. 102(b) as being anticipated by JP 58-138527 (JP '527); claims 1 and 2 were rejected under 35 U.S.C. 102(b) as being anticipated by Matsuoka '137 (U.S. 6,220,137); and claim 3 was rejected under 35 U.S.C. 103(a) as being unpatentable over Matsuoka '137. This rejection is believed moot in view of the amendments to the present claims, and it is respectfully submitted that these rejections are clearly inapplicable to the claims as now presented, for the following reasons.

With exemplary reference to the drawing figures, claim 1 sets forth a module cam assembly to be mounted between upper and lower die holders (e.g. 21, 25 in Fig. 6) of a press machine, the module cam assembly comprising: a cam unit comprising a cam driver 2, a cam slider 3 to be driven by the cam driver 2, the cam slider 3 having a vertical side 3a with a punch retainer 26a thereon, and a cam base 4 holding the cam slider 3; and a monolithic L-shaped

module base 5 (see Figs. 1, 2A, 3, 4A and 5) bearing the cam unit (2, 3, 4, 6), and being adapted to be laid on and fastened to the lower die holder (e.g. 25), the monolithic L-shaped module base 5 having an upright leg 5b with a button die 27 thereon in confronting relation with the punch retainer 26 of the cam slider 3.

Claim 2 is directed to a method of adjustably fixing a punch and a button die to a press machine in exact alignment, comprising: preparing a module cam assembly as described above (i.e. as recited in claim 1); fastening the punch 26 to the punch retainer 26a of the cam slider and the button die 27 of the upright leg 5b of the monolithic L-shaped module base 5 to be aligned with each other in confronting relation; and putting and fastening the module cam assembly having the punch 26 and the button die 27 thus fixed in position on the lower die holder 25 of the press machine.

In contrast to the present invention of claims 1 and 2, both the JP '527 reference and the Matsuoka '137 patent fail to disclose or suggest the type of arrangement according to the present invention wherein a cam unit is supported on a monolithic L-shaped module base. Thus, a key feature of the present invention as recited in claims 1 and 2 are the provision of a cam unit that is arranged to be pre-assembled as a block, such that the block can be a handled as a unit during assembly of the module cam assembly and during setting of a machine tool such as a punch and a die in the module cam assembly. Another key feature is the use of a monolithic L-shaped module base 5 that is assembled with such a cam unit to form the module cam assembly. The monolithic L-shaped module base is assembled with the cam unit to form the module cam assembly, and the monolithic construction of the base 5 thus brings about a high precision in setting the punch and the die. Accordingly, the module cam assembly can be handled and operated with the punch and die kept in a high precision relationship, and can be easily attached to upper and lower die holders to form a press machine while the punch and the die are maintained at highly-precise positions. Thus, the provision of the cam driver, cam slide and cam base as a single cam unit, and also the provision of the monolithic L-shaped module base are

important features of the present invention, in order to attain high precision for the punch and die positioning.

Because of these clear distinctions between the present invention of the present claims and the disclosures of the JP '527 and Matsuoka '137 references, it is believed to be apparent that the present claims are not anticipated by either of these references. Furthermore, the differences are such that a person having ordinary skill in the art would clearly not have been motivated to modify the press apparatus disclosed therein or to make any combination of the references of record in such a manner as to result in or otherwise render obvious the present invention of claims 1-3. Therefore, it is respectfully submitted that claims 1-3 are clearly allowable over the prior art of record.

In view of the foregoing amendments and remarks, it is respectfully submitted that the present application is clearly in condition for allowance. An early notice thereof is earnestly solicited.

If, after reviewing this Amendment, the Examiner feels there are any issues remaining which must be resolved before the application can be passed to issue, it is respectfully requested that the Examiner contact the undersigned by telephone in order to resolve such issues.

Respectfully submitted,

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